UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF INDIANA HAMMOND DIVISION

In Re:	IRIS KELLY,)	
)	CASE NO. 19-20053
)	CHAPTER 7
		Debtor.)	

MOTION FOR REDEMPTION UNDER 11 U.S.C. §722

COMES NOW the Debtor, by and through her attorney, Miguel F. Martinez of Law Offices of Moseley & Martinez, LLC, and moves this Honorable Court pursuant to 11 U.S.C. §722 and Bankruptcy Rule 6008 for a Redemption Order and states in support thereof:

- 1. The item to be redeemed is tangible personal property intended primarily for personal, family, or household use, and is more particularly described as 2016 GMC Light Duty Terrain, VIN # 2GKALMEK5G6184418.
- 2. The interest of the Debtor in such property is exempt or has been abandoned by the estate and the debt which is secured by said property to the extent of the allowed secured claim of the Creditor is a dischargeable consumer debt.
- 3. The allowed secured claim of Santander Consumer USA, for purposes of redemption, should be determined to be not more than \$14,313.00 as evidenced by the Vehicle Condition Report attached hereto as Exhibit A and incorporated as is fully stated herein.
- 4. Arrangement has been made by the Debtor to pay Santander Consumer USA up to the aforesaid amount in a lump sum should this order of redemption be entered.
- 5. The 2016 GMC Light Duty Terrain is of inconsequential value or benefit to the estate.

WHEREFORE, DEBTOR prays that this Honorable Court enter an order:

- A. Requiring Santander Consumer USA to accept from Debtor the lump sum payment of \$14,313.00 the redemption value, and;
- B. Requiring Santander Consumer USA to release its lien of record against the 2016 GMC Light Duty Terrain, VIN # 2GKALMEK5G6184418 in question, and;
- C. Allowing Debtor to redeem the subject property by paying to the creditor the redemption amount on or before the 30th day following entry of the order

Respectfully submitted,

Date: March 1, 2019 /s/ Miguel F. Martinez

Miguel F. Martinez, Esq.

Law Offices of Moseley & Martinez, LLC

1559 E. 85th Ave. Merrillville, IN 46410

219-472-8391

CERTIFICATE OF SERVICE

I CERTIFY THAT ON March 1, 2019, SERVICE OF A TRUE AND COMPLETE COPY OF THE FOREGOING MOTION FOR REDEMPTION UNDER 11 U.S.C. §722 HAS BEEN SERVED UPON: SEE BELOW BY ELECTRONIC FILING OR BY DEPOSITING THE SAME IN THE UNITED STATES MAIL PROPERLY ADDRESSED AND WITH SUFFICIENT FIRST CLASS POSTAGE AFFIXED.

Date: March 1, 2019 /s/ Miguel F. Martinez

Miguel F. Martinez, Esq.

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